

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

MARA FLAMM,

Plaintiff,

V.

SARNER & ASSOCIATES, P.C. and
JOSHUA SARNER, ESQUIRE and
LEONARD SARNER, ESQUIRE and
JODI H. BROWN, M.D. and JOHN
MATUSAVAGE,

Defendants.

CIVIL ACTION

NO. 02-4302

MOTION FOR SUMMARY JUDGMENT OF THE SARNER DEFENDANTS

Defendants, Sarner & Associates, P.C.; Joshua Sarner, Esquire; and Leonard Sarner, Esquire (collectively “the Sarner defendants”), respectfully move this Court to dismiss plaintiff’s complaint pursuant to Federal Rule of Civil Procedure 56 and for the reasons set forth in the Sarner defendants' supporting Memorandum of Law, which are incorporated herein by reference as though set forth at length.

Respectfully submitted,

CHRISTIE, PABARUE, MORTENSEN and YOUNG
A Professional Corporation

By:

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Attorneys for Defendants, Sarner & Associates, P.C.;
Joshua Sarner, Esquire and Leonard Sarner, Esquire
("the Sarner Defendants")

Dated: March 7, 2005